

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE: MULTIPLAN HEALTH  
INSURANCE PROVIDER LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 1:24-cv-06795  
MDL No. 3121

Hon. Matthew F. Kennelly

**CASE MANAGEMENT ORDER NO. 19**  
**(STIPULATED ORDER REGARDING TIMING OF**  
**MOTIONS TO STRIKE AFFIRMATIVE DEFENSES)**

Class Plaintiffs, Direct Action Plaintiffs, and Defendants (together, the “Parties”), through their respective counsel of record, stipulate to the following regarding the timing of anticipated motions to strike (or similar motions) seeking to dismiss affirmative defenses asserted in Defendants’ answers in this matter, subject to approval by the Court:

1. The Parties agree that this stipulation will govern the timing of the filing of any motions to strike, dismiss, and/or for judgment on the pleadings with respect to certain or all of Defendants’ affirmative defenses (the “Motions”).<sup>1</sup>
2. The Parties agree that it will be most efficient to defer the briefing schedule for any Motions until after the Direct Action Plaintiff discovery bellwethers are selected.
3. The Parties therefore agree and stipulate that the deadline to file any Motions shall

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<sup>1</sup> This stipulation applies to Defendants who were named in a Direct Action Plaintiff complaint prior to July 31, 2025. For those Defendants named in Direct Action Plaintiff cases on or after July 31, 2025, the parties will submit a separate proposed schedule to account for this and various other case deadlines.

be 60 days after the selection of Direct Action Plaintiff bellwethers for discovery purposes.<sup>2</sup>

4. The Parties also agree and stipulate that oppositions to any Motions shall be filed 60 days after the Motions are filed, and replies shall be due 30 days after the oppositions.

5. The Parties shall meet and confer within 30 days after the selection of Direct Action Plaintiff discovery bellwethers to discuss any objections to Defendants' affirmative defenses and to determine whether any other modifications to the scheduling of these issues are appropriate.

Dated: September 25, 2025

/s/ Christopher A. Seeger

Christopher A. Seeger  
**SEEGER WEISS LLP**  
55 Challenger Road 6th Fl.  
Ridgefield Park, NJ 07660  
Tel.: (973) 639-9100  
Fax: (973) 679-8656  
cseeger@seegerweiss.com

*Plaintiffs' Coordinating Counsel*

/s/ Sadik Huseny

Sadik Huseny (*pro hac vice*)  
**LATHAM & WATKINS LLP**  
300 Colorado Street, Suite 2400  
Austin, TX 78701  
Tel.: (737) 910-7300  
sadik.huseny@lw.com

*Defendants' Coordinating Counsel*

SO ORDERED.

Dated: September 30, 2025

  
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Hon. Matthew F. Kennelly

<sup>2</sup> CMO 17 sets a September 30, 2025 deadline for submitting proposals (joint or disputed) for the bellwether process.